

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

BORRAH E. CAMPBELL II,)	
)	
Plaintiff)	
)	CIVIL ACTION NO.
v.)	2:06-CV-205-WHA-CSC
)	
UNITED PARCEL SERVICE, INC.,)	
)	
Defendant.)	
_____)	

**DEFENDANT UNITED PARCEL SERVICE, INC.'S FIRST INTERROGATORIES TO
PLAINTIFF**

Defendant United Parcel Service, Inc. ("UPS") hereby requests that Plaintiff Borrah E. Campbell II ("Plaintiff") answer, under oath, the following interrogatories within thirty (30) days of service of the interrogatories on Plaintiff pursuant to Federal Rules of Civil Procedure 26 and 33. UPS further requests that Plaintiff supplement his answers as required by Federal Rule of Civil Procedure 26(e).

DEFINITIONS AND INSTRUCTIONS

A. The term "document" means every information-containing thing, including copies and duplications. The term "document" includes correspondence, memoranda, papers, records, computer printouts, magnetic tapes, disks or other computer-stored information, teletype, telefax, audio tapes, videotapes, transcripts of audio tapes or videotapes, film, photographs, graphic or aural recordings or representations of any kind, checks, bank statements, orders, contracts, agreements, notes of telephone or other conversations, diaries, journals, and any other information-containing paper, writing or thing.

B. The terms “you” and “Plaintiff” mean the named Plaintiff, Borrah E. Campbell II, and all his agents, representatives, and attorneys.

C. The term “identify” or “describe” or “state the identity of” means:

(1) as to a person, to state the full name, any nickname or alias, present business and home addresses, present business and home telephone numbers, and present or last known position in business;

(2) as to a firm, partnership, corporation, or any other form of business entity, to state the full name, address, and telephone number;

(3) as to a document, to describe the type of document (e.g., letter, statement, memorandum, telegram, notes of telephone conversation, etc.), its date, the identity of the sender(s) and recipient(s), and its present location and custodian. Alternatively, you may simply produce a copy of the document. As to a document that was, but is no longer, in your possession or control, state what you did with the document and where it is presently located;

(4) as to any communication, to state the type of communication (e.g., oral, written, computer, etc.), the date and substance of the communication, the identity of the participants, and any documents evidencing the communication.

D. If you withhold any document, communication, or thing requested, state the precise nature of your objection to production and provide a list of the withheld documents, communications or things that includes the following: the identity of the author(s) or participant(s); the identity of each recipient of the document or information and the identity of the individual(s) to whom copies have been furnished or the information communicated; the date the document was created or the information disseminated; and a description of the subject matter of the document or information.

INTERROGATORIES

1.

Identify all persons you believe have knowledge of any facts supporting any of the allegations and claims raised in your Amended Complaint. For each such person identified, state the facts believed to be known by that person.

2.

Identify all persons from whom you have procured or attempted to procure a sworn or unsworn statement, in any form, that relates to any of the allegations and claims raised in your Amended Complaint.

3.

Identify all persons with whom you have communicated concerning the allegations and claims raised in your Amended Complaint.

4.

Identify all documents relating to or supporting any of the claims or allegations in your Amended Complaint.

5.

Identify all persons or business entities with whom you have communicated, since the time your employment with UPS ended, regarding any job or employment opportunity. For each such person or business entity identified, state whether you submitted an employment application or resume to that person or entity and, if so, the date you submitted it; identify the person(s) with whom you communicated; identify the job position for which you applied; and state whether you accepted or rejected any employment offer.

6.

Identify all persons or business entities with whom you have been employed, or from whom you have derived any income (including self-employment) since your 18th birthday, including any employment and any income received since your employment with UPS ended. For each such person or business entity identified, state the dates of employment; state your hourly wage or annual salary; state your job title; describe your job duties; and, where applicable, state the reason for termination of your employment.

7.

Identify all persons whom you have retained or whom you expect to retain as an expert witness to provide evidence in this action. For each person so identified, provide the information specified in Federal Rule of Civil Procedure 26(a)(2).

8.

Identify all lawsuits or government agency charges, complaints, claims, or actions, including claims for unemployment insurance, and any appeals in which you have participated as a party, witness or in any other capacity since January 1, 1996.

9.

List separately and specifically all items of actual damages that you contend you are entitled to receive from UPS. For each item of damages so identified, state which specific allegation or claim in your Amended Complaint that you contend entitles you to recover that item; state the amount of money you contend you are entitled to receive in this lawsuit for that item; and provide an explanation of how you determined or calculated that amount.

10.

Identify each and every healthcare professional or entity, including physicians, psychiatrists, psychologists, therapists, counselors, clinics and hospitals, with whom you have consulted or from whom you have received treatment since January 1, 1998. For each person or entity identified, state the name, address, and telephone number; list the dates of all consultations or communications with that person or entity since January 1, 1998; and describe the subject matter of the consultation or communication, the diagnosis given, and the nature of any treatment received.

11.

Identify any names, other than "Borrah E. Campbell II," that you have ever used or by which you have ever been known, and the dates that you used or were known by each name.

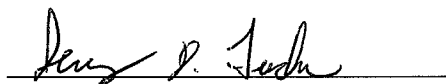
12.

Identify and describe all instances in which you have been indicted, charged, convicted, arrested, or pled no contest for any crime, and state the date of the indictment, charge, conviction, arrest, or plea.

13.

Identify the name, address, and dates of your attendance at any high school, technical school, university, or other school and, for each such school identified, state the subject matter you studied and any degree or certificate you received.

Served this 21st day of April 2006.



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Attorneys for Defendant United Parcel Service, Inc.

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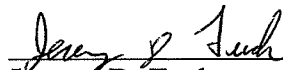
CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the within and foregoing
**DEFENDANT UNITED PARCEL SERVICE, INC.'S FIRST INTERROGATORIES TO
PLAINTIFF** by United States Mail with adequate first class postage affixed thereon, addressed
as follows:

Borrah E. Campbell II
38 Fairlane Drive
Montgomery, AL 36106

Plaintiff *pro se*

This 21st day of April 2006.



Jeremy D. Tucker